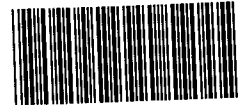




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July 8, 2014

Ms. Carlyn Winter Prisk (3HS62)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

**Re: Required Submission of Information
Lower Darby Creek Area Superfund Site
Operable Units 1 and 3, Clearview Landfill
Darby Township, Delaware County, PA and Philadelphia, PA**

Dear Ms. Prisk:

On June 24, 2014, Meadowbrook Insurance Group, Inc. and Century Insurance Group (collectively referred to as "Meadowbrook") received Ms. Joanne Marinelli's letter relating to the Lower Darby Area Superfund Site. This letter requests certain information from Century as identified in Enclosure E.

Please allow the following to serve as Century's response to the items described in Enclosure E:

Question:

1. Provide copies of all casualty, liability and/or pollution insurance policies issued by Century or by Meadowbrook Insurance Group, Inc.'s or its other underwriters or subsidiaries (collectively, "Meadowbrook"), to any or all of the Clearview Entities between 1953 and 1986, including but not limited to comprehensive general liability, primary, umbrella and excess policies, as well as any environmental impairment liability or pollution legal liability insurance.

Response:

Meadowbrook does not have a copy of any casualty, liability and/or pollution insurance policy issued by it to the Clearview entities for the period 1953 through 1986.

Question:

2. If there are any casualty, liability and/or pollution insurance policies ever issued by Century or Meadowbrook to any or all of the Clearview Entities between 1953 and 1986 of which you have any evidence, or are aware, but have no copies, identify each such policy to the best of your ability by identifying:

- a. The name and address of each insurer and of the insured;
- b. The type of policy and policy numbers;
- c. The per occurrence or per accident policy limits of each policy; and
- d. The commencement and expiration dates of such policy.
- e.

Response:

Meadowbrook does not have any casualty, liability and/or pollution insurance policy issued by it to the Clearview entities for the period 1953 through 1986.

Question:

3. To the extent not identified in your responses to Questions 1 or 2 above, provide all other evidence of casualty, liability and/or pollution insurance ever issued by Century or Meadowbrook to any or all of the Clearview Entities between 1953 and 1986.

Response:

Meadowbrook does not have any other evidence of casualty, liability and/or pollution liability insurance issued by it to the Clearview entities for the period 1953 through 1986.

Question:

4. For each policy of insurance identified in your responses to Questions 1, 2 or 3 above, provide all underwriting files, claim files, loss control files, and premium audits, as well as any accounting records including retrospective rating adjustments, for each such policy.

Response:

Because Meadowbrook has no casualty, liability and/or pollution liability insurance policy for the period identified, Meadowbrook does not have any underwriting, claim, loss control, premium audit, or accounting records with regard to such alleged policies.

Question:

5. Provide all documents and files that constitute evidence, refer, or relate to claims made by any or all of the Clearview Entities under any of the policies identified in your responses to Questions 1, 2, or 3.

Response:

Because Meadowbrook does not have any casualty, liability and/or pollution liability insurance policy between it and the Clearview entities for the period 1953 through 1986, it does not have any corresponding claim files for said period.

Question:

6. Identify all previous settlements made by Century or Meadowbrook to any or all of the Clearview Entities which relate in any way to environmental liabilities and/or to casualty, liability and/or pollution insurance coverage, including:
 - a. The date of the settlement;
 - b. The scope of release provided under such settlement;
 - c. The amount of money paid by any insurer pursuant to such settlement; and
 - d. Provide copies of all such settlement agreements;

Response:

Meadowbrook has not entered into any previous settlement relating to the Clearview entity for environmental liabilities, casualty, liability and/or pollution liability insurance for the period 1953 through 1986.

Question:

7. Identify all insurance agencies or brokerage firms that place any casualty, liability and/or pollution insurance policies issued by Century or Meadowbrook to any or all of the Clearview Entities between 1953 and 1986. Include the name, address, telephone number and time period when the agency placed insurance on behalf of Century or Meadowbrook as well as the name and current whereabouts, if known, of individuals at the agency or brokerage firm with whom Century or Meadowbrook communicated and the nature of the communication. If Century or Meadowbrook believes no agency or brokerage firm was used to buy casualty and/or liability and environmental insurance, provide an explanation of how such insurance was purchased.

Response:

Because Meadowbrook did not issue a casualty, liability and/or pollution liability insurance policy to the Clearview entities for the period 1953 through 1986, it does not have evidence of any agencies or brokerage firms who would have placed such policies.

Question:

8. Provide any information in Century or Meadowbrook's possession related to insurance policies issued to any or all of the Clearview Entities by any insurer prior to Century or Meadowbrook's relationship with such party.

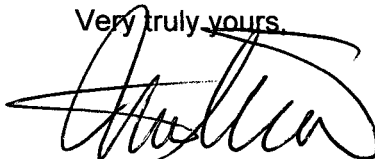
Response:

Meadowbrook has no evidence of any prior insurer of the Clearview entities for the period described in the request.

Meadowbrook's response is based upon a review of its records. If you have any information to the contrary, please forward it to us for reconsideration and reply.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael G. Costello", with a large, sweeping flourish extending from the end of the signature.

Michael G. Costello
Senior Vice President and General Counsel

MGC/dmd